

State of California—Health and Human Services Agency
Department of Health Services



GRAY DAVIS
Governor

November 15, 2002

TO: FAMILY PACT PROVIDERS

SUBJECT: FAMILY PACT PROVIDER LETTER 02-05
COLLECTION OF SOCIAL SECURITY NUMBERS
and ELIGIBILITY BASED ON NEED FOR CONFIDENTIALITY

Data from providers serving Family PACT clients is reviewed on an ongoing basis as part of the Family PACT Quality Improvement Process. Recent data reviews have identified potential problems related to two aspects of client enrollment:

- Collection of client Social Security Numbers (SSN); and,
- Use of “client confidentiality” as a qualifying factor for eligibility.

This letter notifies you, the Family PACT provider, of your responsibility to assure that receptionist staff is enrolling clients consistent with the Family PACT Program manual Policies, Procedures and Billing Instructions (PPBI). Excerpts of the manual related to the required request for a client’s SSN and the unique client circumstances related to confidentiality as a factor in client eligibility is included with this letter.

SSNs are invaluable identifiers used to evaluate use of health services across databases. While some clients might not have SSNs, it is the provider’s responsibility to request the number and assure clients that providing their SSN will not compromise the client’s privacy. The reason why a SSN is not collected must be documented on the Client Eligibility Certification form (PPBI: familyfact7, p. 3 (May 2002)).

All clients are entitled to confidentiality related to the provision of sensitive services such as family planning. All Family PACT clients should be asked, and the health record should document, how they want to be contacted for the results of laboratory tests and ongoing family planning services. However, confidentiality as a Family PACT eligibility criteria for clients with other health care coverage for family planning is limited to unique privacy issues related to a client’s parents, spouse or partner.



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Most persons with other health care coverage for family planning services are not eligible for Family PACT services. It is the provider's responsibility to help clients understand usual and customary confidentiality of medical services and to determine if a client with other health care coverage has unique privacy issues related to his/her parents, spouse or partner. Only this unique confidentiality need would make him/her eligible for Family PACT, so long as all other eligibility criteria are met (PPBI: familyfact4, p. 9 (August 2001)).

The Family PACT Quality Improvement Program is ongoing and encompasses an array of indicators reflective of the quality of care delivered in Family PACT. Tools to enhance quality of care include Family PACT Program Letters such as this one. Providers with particularly unusual data indicators will be notified by certified letter of concerns related to quality of care with follow-up as needed.

Your participation in Family PACT is appreciated. As detailed in the provider agreement you signed, implementation of Family PACT program policies is a requirement of ongoing enrollment in the program. If you have any questions about this letter or other aspects of Family PACT, please feel free to call the Office of Family Planning at (916) 654-0357.

Sincerely,

[original signed by]

Anna Ramírez, M.P.H., Chief
Office of Family Planning

Enclosure

Excerpts from the Family PACT Manual
Policies, Procedures and Billing Instructions
(PPBI)

Client Social Security Number

PPBI: familypact7, p.3 (May 2002)

Instruction for completing the Client Eligibility Certificate (CEC)

Family PACT providers are required to ask for a client's Social Security Number (SSN). If the client does not provide the SSN, the reason it is not available must be documented on the CEC form in the "Social Security Number" box. Providers may not deny access to family planning services if the client is unable or unwilling to provide an SSN.

Confidentiality

PPBI: familypact4, p.9 (August 2001)

Confidentiality as it relates to client eligibility

Clients who have other health coverage are eligible for Family PACT services if:...A barrier to access exists. A barrier to access is when a client's Medi-Cal, private health insurance or prepaid health plan does not assure provision of services to a client without his or her spouse, partner or parents being notified or informed. If the client indicates on the Client Eligibility Certification form that family planning services should be kept confidential from spouse, partner or parent, there is a barrier to access and the client is eligible for Family PACT services, if the client meets the family size and income eligibility requirements.